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September 22, 2023

**By ECF**

Honorable Colleen McMahon  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *In re MAERSK ESSEN Voyage 51 Shipper Cases*  
Case No. 21 Civ. 8183 (CM)(GWG) (lead case)

Dear Judge McMahon,

We represent defendant Maersk A/S in the above-captioned consolidated cases. On behalf of all the parties, we are writing to report on our efforts.

The parties continue to work cooperatively on resolving the claims, and there are no open issues to be resolved by the Court. The majority of the remaining legal actions are in the final stages of being resolved. This only leaves a handful of actions to be addressed in the upcoming weeks.

As noted in our last update, a few claims were held up by non-responsive parties. Further discussions have narrowed us down to a single non-responsive party. We will continue to follow up with them. If unable to reach a resolution, a separate letter will be submitted requesting a settlement conference involving a select group of parties.

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We thank Your Honor in advance for your consideration and understanding. If there are any questions or concerns, please do not hesitate to contact the undersigned.

Respectfully submitted,

**MONTGOMERY MCCRACKEN  
WALKER & RHOADS, LLP**

*Attorneys for Defendant Maersk A/S*

/s/ Timothy Semenoro

Timothy Semenoro

Robert E. O'Connor

CC by ECF to all counsel of record